REMARKS

1. An interview with the examiner was held on April 9, 2008, during which Applicant argued that U.S. 5,147,148 ("White") does not disclose or suggest laterally supporting production risers in keel guides that are individual and directly attached to a pontoon, where the pontoon is connected between the tendon porches and defines at least a portion of the perimeter of the hull of the tension leg platform. Rather, White discloses the technique of supporting the risers near the center of the tension leg platform and at a significant distance from the mooring tendons, which is contrary to the stated objects of the invention. An agreement with respect to the patentability of the claims was not reached.

Applicant also argued that the pending objection to the replacement drawing sheet with amended Figure 10 and the claim rejections under 35 U.S.C. § 112 is improper, because there is support for the passive spring riser tensioner limitation in the specification. The examiner agreed to reconsider this issue upon Applicant's reply to the Office Action.

2. The drawings were objected on the basis that they failed to show the claimed passive spring riser tensioner. Applicant respectfully disagrees. The specification as originally filed states:

> Figure 10 illustrates a production riser system according to the invention. Riser 14 is shown connected to a subsea wellhead 40 at the ocean floor 11. In order to compensate for riser stroke caused by environmental forces on the riser 14 and the platform 10, **the riser 14 is tensioned from deck 20 by a passive spring riser tensioner 42. Preferably, the tensioner 42 is located on the cellar deck of platform 10.** Riser 14 is laterally supported by a keel guide 7 attached to the platform hull 18 and keel joint 8 which is received in the keel guide 7. The riser 14 terminates at a tubing head 44 and surface tree 46, with an injection umbilical 48 and a production umbilical 50 extending therefrom. [Specification p. 8 ll. 16-23 (emphasis added).]

There is solid basis to conclude that, as originally filed, Figure 10 shows a passive spring riser tensioner that tensions the riser 14 from the deck 20. With exception of a human worker and

what clearly resembles a protective railing on deck 20, all elements but one in Figure 10 are labeled. The unlabeled element depicts laminations that resemble a heavily compressed leaf-spring or Belleville spring arrangement. The unlabeled element also is disposed on deck 20 and abutting the underside of what appears to be a collar bolted around riser 14. Thus, the unlabeled element must correspond to the passive spring riser tensioner referred to in the specification, and it is apparent that reference numeral 42 was inadvertently omitted. Applicant submits that this reply is fully responsive to the objection to the drawings.

3. In Applicant's Response to Office Action dated October 30, 2007, a replacement drawing sheet including an amended Figure 10 was submitted. Figure 10 was amended to add the reference numeral 42 to the spring tensioner. The examiner disapproved the replacement drawing sheet on the basis that the specification as originally filed provides no basis for the element to be labeled as the passive riser tensioner. Applicant respectfully disagrees. As discussed above, the passive spring riser tension is shown in Figure 10 as originally filed. Applicant therefore submits that labeling this element as passive spring riser tensioner does not constitute the introduction of new matter, but merely conforms the drawings to the specification. Applicant submits that a corrected drawing sheet is therefore not required, although applicant requests approval and entry of the drawing sheet filed October 30, 2007 in order to add reference numeral 42 to the passive spring riser tensioner to conform the reference numerals to the specification.

4. Claims 1-7, 9, 10, 12, 14, 16, 23, 25, 30-32, 36, and 45-54 were rejected under 35 U.S.C § 112 1st Paragraph on the basis that the subject matter of the passive spring riser tensioner was not described in such a way to convey to one skilled in the art that the inventors had possession of the claimed invention. The examiner also appears to question whether the

written description of the passive spring riser tensioner is enabling to one skilled in the art. Applicant respectfully requests reconsideration of the § 112 rejections in view of the argument above that Figure 10 shows a passive spring riser tensioner 42.

5. Claims 1-7, 9, 10, 12, 14, 16, and 51 were rejected as unpatentable over Davis '250 in view of Whites '148 and Scozzafava '445. Claims 23, 25, 30-32, 36, and 45-54 were rejected as unpatentable over Huang '208 in view of Peterson '439 and Scozzafava '445. Peterson and White are cited for the proposition that they disclose an arrangement in which production risers are suspended vertically from a deck above the waterline and supported laterally by keel guides located below the waterline. Claims 1-7, 9, 10, 12, 14, 16, 23, 25, 30-32, 36, and 45-51 are cancelled without prejudice, and claims 52-54 are amended to further distinguish over White and Peterson.

6. Claims 52-54 cover the embodiment shown in Figure 6 of the specification. At least five individual keel guides are disposed along the exterior, outwardly-facing perimeter of the pontoons—close to the hull and mooring tendons—which minimizes stroke in accordance with the stated objects of the invention. In contrast, both White and Peterson position the production risers in a central moonpool—located at a further distance from the hull and mooring tendons porches and not on the overall perimeter of the hull.

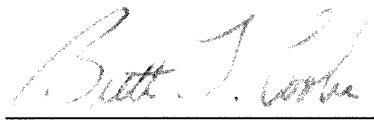
7. Claims 52-54 further include the limitation of first, second, third, fourth and fifth individual keel guides, each having only one aperture for receiving only one production riser therethrough, being directly connected to the hull. Neither White, Peterson, nor the prior art TLP shown in Figure 2 of the specification disclose five individual keel guides each directly connected to the hull pontoons.

8. Claims 52-54 include the limitation of bearing sleeves which are coupled between the production risers and the keel guides. The bearing sleeves are longitudinally fixed within the keel guides. Peterson bearing sleeves 27 and White bearing sleeves 14 clearly move within the keel guides.

New claims 55-57 are added that claims the embodiment of Figures 6, and 11-12, including a hull having an octagon shape with four pontoons extending radially therefrom.

Applicant contends that the cited prior art, taken in combination, does not disclose or suggest the claimed invention. Claims 52-57 are pending in the application. Applicant believes the application is in condition for allowance. Allowance of the claims and passage to issue is requested.

Respectfully submitted,



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